

### REMARKS

Claim 11, for example, calls for a buried line formed in the substrate. That buried line includes a more lightly doped region over more heavily doped region and more lightly doped region.

The Examiner suggests that Ovshinsky teaches the more lightly doped region over more heavily doped region. While this is true, the argument fails to teach the claim limitations. The claim limitation requires that the buried line be formed in the substrate. The buried line includes the lightly doped region over and under a more heavily doped region.

In Ovshinsky, the more lightly doped region is not formed in the substrate but, instead, is formed by an epitaxial layer formed over the substrate. As explained in column 15, line 60 *et seq.* of Ovshinsky "on top of this N+ grid structure is formed an N-doped crystalline epitaxial layer 14, again by techniques well known in the art." Thus, Ovshinsky fails to teach the more lightly doped region on top of a more heavily doped region formed in the substrate.

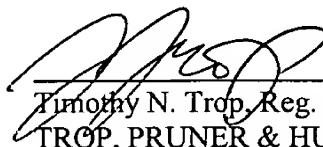
The same element is also missing from the Chang reference. It is plain that neither Chang nor Ovshinsky had any idea how to make a more lightly doped region over a more heavily doped region, as well as a more lightly doped region under the more heavily doped region or they failed to appreciate the reason to do so. To suggest that two references that fail to teach a more lightly doped region formed in the substrate over more heavily doped region also formed in the substrate can somehow teach the opposite begs the obviousness question.

The Section 112 objection is addressed by the amendments to claims 11 and 21.

Reconsideration is respectfully requested.

Respectfully submitted,

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